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By: Kiley D. Scott, Esq.

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS**

MARK REAVES,

Plaintiff,

V.

MASSACHUSETTS ARMY NATIONAL
GUARD and ADJUTANT GENERAL
RAYMOND A. VEZINA

Defendant(s).

Case No. 04-30125-MAP

**MOTION TO EXTEND
DISCOVERY TIME
TIME PERIODS**

TO: Attorney James S. Whitcomb
Office of the Attorney General
Western Massachusetts Division
1350 Main Street
Springfield, Massachusetts 01103

PLAINTIFF, MARK REAVES, through his attorney Kiley D. Scott, Esq., files this

Motion to extend discovery time periods.

I.

The deadline for answering discovery is June 27, 2008.

II.

Counsel was granted admission, Pro Hac Vice to the instant matter on or about

June 17, 2008, ten days before the discovery deadline.

III.

Counsel respectfully request a sixty-day extension of time in which to respond to discovery.

WHEREFORE, counsel respectfully prays for an order granting the plaintiff an additional sixty days in which to answer discovery, no prior application for relief has been made.

Dated: June 24, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kiley D. Scott", is written over a horizontal line.

Kiley D. Scott, Esq.
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